REMARKS

I. Introduction.

Claims 1-19 are pending, and stand rejected. Claims 1 and 3-19 have been rejected under 35 U.S.C. Section 102, or in the alternative, under Section 103. Claim 2 was rejected under 35 U.S.C. Section 103.

II. The Rejections.

A. The Rejection of Claims 1 and 3-19.

Claims 1 and 3-19 were rejected under 35 U.S.C. Section 102(b) as being anticipated by or, in the alternative, under 35 U.S.C. Section 103(a) as obvious over U.S. Patent 5,259,848 issued to Terry, et al.

The Applicants respectfully request that the 35 U.S.C. Section 102(b) rejection of Claims 1 and 3-19 be reconsidered and withdrawn. The Terry, et al. reference does not teach or disclose all of the elements of the process described in these claims. The Terry, et al. reference does not specifically teach or disclose a process of cleaning a carpet comprising the steps of applying a liquid carpet cleaning composition onto a carpet using an electrically operated spraying device; and, at least partially removing the composition. The Terry, et al. reference cannot serve to support a Section 102(b) rejection.

The Office Action ignores the absence of these teachings in the Terry, et al. reference, and states only that "arguments or conclusory statements unsupported by factual evidence are insufficient to establish unexpected results." This is not the proper standard for determining whether a reference supports a rejection under 35 U.S.C. Section 102, and appears to introduce considerations of obviousness into the rejection (unexpected results). The proper standard for anticipation under 35 U.S.C. Section 102 is whether each and every element as set forth in the claim is found, either expressly or inherently, in a single prior art reference. A spray bottle is not an electrically operated spraying device, expressly, or inherently.

The Terry, et al. reference also teaches in Col. 3, lines 32-37, that "[i]f ammonium bicarbonate or ammonium carbonate and hydrogen peroxide are used in the stain removing solution, the solution does not have to be removed after application * * *," which is not a teaching of at least partially

removing a composition. The Section 102(b) rejection is, therefore, improper, and should be withdrawn.

The Applicants also respectfully request that the 35 U.S.C. Section 103 rejection of these claims be reconsidered and withdrawn. As discussed above, the Terry, et al. reference does not teach or disclose, or render obvious, applying a liquid carpet cleaning composition onto a carpet using an electrically operated spraying device; and, at least partially removing the composition. In addition, the Terry, et al. reference does not teach or disclose, or render obvious, applying a carpet cleaning composition in an amount of from 10 ml to 150 ml per m^2 onto at least 50% of a carpet area in a room. Further, the Terry, et al. reference does not teach or disclose, or render obvious, a process that utilizes a carpet cleaning composition having a pH between 0 and 6.5. To the contrary, the Terry, et al. reference appears to be directed to a "spotter" type cleaner which is applied to a small area of carpet, so there would be no motivation for one skilled in the art to use an electrically operated spraying device to apply the Terry, et al. composition to a carpet. In addition, the stain removing composition described in the Terry, et al. reference has a pH between 7.0 and 10.5.

The method described in the Terry, et al. reference also does not employ a storage stable composite product. The Terry, et al. reference describes a method that uses two components, a part A solution and a part B solution, that apparently are not stable over time if mixed together, and thus, have to be mixed together immediately prior to use. The composition described in the Terry, et al. reference would also likely cause color damage to carpets due to the combination of peroxide and alkalinity (pH between 7.0 and 10.5). Therefore, the Terry, et al. reference does not render the claimed process obvious.

B. The Rejection of Claim 2.

Claim 2 was rejected under 35 U.S.C. Section 103(a) as being unpatentable over U.S. Patent 5,259,848 issued to Terry, et al. as applied to Claims 1 and 3-17, and in view of U.S. Patent 6,403,547 issued to Grippaudo, et al.

The Applicants respectfully request that the 35 U.S.C. Section 103(a) rejection of Claim 2 be reconsidered and withdrawn. The combination of references, therefore, does not render the claimed process obvious for the same reasons set forth in Applicants' prior response and for the additional reasons set forth in response to the rejection of Claims 1 and 3-19.

III. Summary.

All of the rejections have been addressed. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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